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Attorneys for Defendant
LA JOLLA COVE INVESTORS, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WORLD SURVEILLANCE GROUP
INC., a Delaware Corporation,

Plaintiff,

v.

LA JOLLA COVE INVESTORS, INC., a
California corporation, and DOES 1-30

Defendants.

CASE NO. 3:13-cv-03455 (WHO)

**LA JOLLA COVE INVESTORS, INC.'S
MOTION FOR ORDER AND [PROPOSED]
ORDER PERMITTING WITHDRAWAL
AND SUBSTITUTION OF COUNSEL**

Pursuant to Civil L.R. 7-11 and 11-5, defendant La Jolla Cove Investors, Inc. ("La Jolla Cove") hereby moves the Court for an order permitting the withdrawal of its counsel of record, Roy K. McDonald of DLA Piper LLP (US), and the appearance of substitute counsel, William J. Frimel of Heffernan Seubert & French, on its behalf in this action. La Jolla Cove respectfully submits that such substitution of counsel is in the interests of justice, and this motion is not being made for purposes of delay or any other improper purpose.

La Jolla Cove, DLA Piper LLP (US), and Heffernan Seubert & French consent to such

1 withdrawal and substitution of counsel. Further, on January 9, 2013, counsel for plaintiff World
2 Surveillance Group Inc., Brett Gibbs of Weisberg & Miller, was informed of the proposed
3 substitution and confirmed that plaintiff does not oppose this motion.

4 Accordingly, La Jolla Cove respectfully requests that the Court enter an order permitting
5 withdrawal and substitution of counsel for La Jolla Cove; that all necessary changes be made to
6 the Court's records and ECF system for this case by removing Roy K. McDonald of DLA Piper
7 LLP (US) as counsel of record and substituting in his place William J. Frimel of Heffernan
8 Seubert & French; and that all future communications regarding this case be directed to the
9 following:

10 HEFFERNAN SEUBERT & FRENCH LLP
11 WILLIAM J. FRIMEL, Bar No. 160287
12 bill@hsfllp.com
13 1075 Curtis Street
14 Menlo Park, CA 94025
15 Tel: 650.322.3048

16 Respectfully submitted,

17 Dated: January 13, 2014

DLA PIPER LLP (US)

18 By: */s/ Roy K. McDonald*
19 ROY K. MCDONALD

20 Dated: January 13, 2014

HEFFERNAN SEUBERT & FRENCH

21 By: */s/ William J. Frimel*
22 WILLIAM J. FRIMEL

23 Attorneys for Defendant
24 LA JOLLA COVE INVESTORS, INC.

1 Dated: January 13, 2014

LA JOLLA COVE INVESTORS, INC.

2
3 By: /s/ Steven M. Romanoff
4 STEVEN M. ROMANOFF

5
6 I, Roy K. McDonald, am the ECF user whose ID and password are being used to file this
7 document. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that William Frimel and
8 Steven M. Romanoff have given their concurrence in the filing of this document.

9
10 **[PROPOSED] ORDER**

11 Having reviewed and considered defendant La Jolla Cove Investors, Inc.'s Motion for
12 Order Permitting Withdrawal and Substitution of Counsel, and good cause appearing, the Court
13 hereby orders that Roy K. McDonald of DLA Piper LLP (US) be permitted to withdraw as
14 counsel of record, and William J. Frimel of Heffernan Seubert & French be permitted to appear as
15 substitute counsel of record for La Jolla Cove Investors, Inc. The Court's records and ECF
16 system shall be updated to reflect these changes.

17 **IT IS SO ORDERED.**

18
19 Dated: _____, 2014

20 _____
21 HONORABLE WILLIAM H. ORRICK
22 UNITED STATES DISTRICT JUDGE